

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 1:15CV1046
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
v.	)	
	)	
CITY OF CLEVELAND,	)	<u>JOINT STATUS REPORT REGARDING</u>
	)	<u>CITY OF CLEVELAND CHARTER</u>
Defendant.	)	<u>AMENDMENTS</u>
	)	

In accordance with its obligations under recently adopted amendments to Section 115 of its Charter, the City of Cleveland filed a motion (Dkt. # 389) on December 2, 2021 to modify the Settlement Agreement (“Agreement”) in this matter (Dkt. # 7-1). The Agreement provides that any “changes, modifications and amendments” are to be made through joint agreement of the Parties, and “will be effective if approved by the Court.” (Dkt. #7-1, p. 96). To allow for discussion between the United States and the administration of newly elected Mayor Justin Bibb of potential modifications to the Agreement, the United States requested time until February 18, 2022 (Dkt. # 394).

Since that time, the Parties have worked independently and together to determine what potential amendments may be appropriate in light of Charter Section 115. We have made meaningful progress toward this goal. These issues are of great significance to the Cleveland community, the protection of civil rights, and the provision of public safety, however, and the Parties are continuing to work to ensure that the rights protected by the Agreement and the will of the voters of Cleveland are respected. To permit the Parties to give this matter the close

attention that it warrants, we request further forbearance on consideration of the motion until March 16, 2022.

**CONCLUSION**

The Parties respectfully request that the Court grant the parties until March 16, 2022 to consider any proposed changes to the Agreement in accordance with the modification process set forth in the Agreement.

Respectfully submitted,

**FOR THE UNITED STATES**

STEVEN J. PAFFILAS  
Civil Chief  
Northern District of Ohio

/s/ Michelle L. Heyer

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